

Anna Sortun, OSB No. 045279
Direct: 503.802.2107
Email: anna.sortun@tonkon.com
Steven M. Wilker, OSB No. 911882
Direct: 503.802.2040
Email: steven.wilker@tonkon.com
Paul Balmer, OSB No. 203429
Direct: 503.802.5745
Email: paul.balmer@tonkon.com
Gracey Nagle, OSB No. 215255
Direct: 503.802.5753
Email: gracey.nagle@tonkon.com
Tonkon Torp LLP
1300 SW Fifth Ave., Suite 2400
Portland, OR 97201
Facsimile: 503.274.8779
Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

OREGON COUNCIL FOR THE
HUMANITIES d/b/a OREGON
HUMANITIES, a nonprofit corporation;
FEDERATION OF STATE HUMANITIES
COUNCILS, a nonprofit corporation,

Plaintiffs,

v.

UNITED STATES DOGE SERVICE, a
component of the Executive Office of the
President; AMY GLEASON, in her official
capacity as Acting Administrator of the
United States DOGE Service; NATIONAL
ENDOWMENT FOR THE HUMANITIES,
an independent federal agency, and its
advisory council NATIONAL COUNCIL ON
THE HUMANITIES; MICHAEL
MCDONALD, in his official capacity as
Acting Chairman of the National Endowment
for the Humanities,

Defendants.

Civil No. 3:25-cv-00829-SI

**UNOPPOSED [PROPOSED] BRIEFING
SCHEDULE FOR PLAINTIFFS'
MOTION FOR 5 U.S.C. § 705 STAY
AND PRELIMINARY INJUNCTION**

Counsel for Plaintiffs Oregon Council for the Humanities and Federation of State Humanities Councils (“Plaintiffs”) conferred with the United States Attorney’s Office for the District of Oregon, which represents Defendants United States DOGE Service, Amy Gleason, National Endowment for the Humanities, and Michael McDonald (“Defendants”) (collectively the “Parties”). The Parties agree to the following modified schedule for briefing on Plaintiffs’ Motion for 5 U.S.C. § 705 Stay and Preliminary Injunction (“Motion”), and respectfully request the Court adopt the following proposed schedule.

1. **On or by July 15, 2025:** Defendants will file responsive papers.
2. **On or by July 30, 2025:** Plaintiffs will file any reply papers.

Further, the Parties have conferred regarding oral argument on the Motion. The Parties request oral argument and can be available for argument August 4, 5, 11, 12, 13, 14, or 15, 2025, subject to the Court’s availability and preferences. The Parties are not available August 6-8. If the Court has alternate preferred dates, the Parties will confer and make themselves available.

DATED: June 25, 2025.

TONKON TORP LLP

By: /s/ Anna Sortun
Anna Sortun, OSB No. 045279
Direct: 503.802.2107
Email: anna.sortun@tonkon.com
Steven M. Wilker, OSB No. 911882
Direct: 503.802.2040
Email: steven.wilker@tonkon.com
Paul Balmer, OSB No. 203429
Direct: 503.802.5745
Email: paul.balmer@tonkon.com
Gracey Nagle, OSB No. 215255
Direct: 503.802.5753
Email: gracey.nagle@tonkon.com
Attorneys for Plaintiffs